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9 UNITED STATES BANKRUPTCY COURT
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12 IN AND FOR THE EASTERN DISTRICT OF WASHINGTON
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15 In re:
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17 **HUSCH & HUSCH, INC.,**
18
19 Debtor.

20 No.: **20-00465-WLH11**
21
22 Chapter 11

23
24 **MOTION FOR ORDER TO APPROVE
25 DEBTOR'S EXECUTION OF:**

1. **AMENDMENT TO ARTICLES OF
INCORPORATION OF HUSCH &
HUSCH, INC.;**
2. **AMENDMENT TO SHAREHOLDER
AGREEMENT; AND**
3. **MINUTES OF A SPECIAL MEETING OF
THE BOARD OF DIRECTORS AND
SHAREHOLDERS OF HUSCH &
HUSCH, INC., A WASHINGTON
CORPORATION**

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27 Debtor, by its undersigned attorney, moves the court for an order authorizing
28 Debtor to participate in the execution of certain documents, the effect of which is to
29 convert debt and/or claims shareholders hold against Debtor, as unsecured creditors, to
30 non-voting common stock.

31 Debtor moves the court for an order approving the execution by Debtor and
32 shareholders of the following documents:
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1. Amendment to Articles of Incorporation of Husch & Husch, Inc., a copy of which is attached as Exhibit 1 to the notice to creditors regarding this Motion;

34 Motion-1

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36 **SOUTHWELL & O'ROURKE, P.S.**
37 A PROFESSIONAL SERVICE CORPORATION
38 ATTORNEYS AT LAW
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2. Amendment to Shareholder Agreement, a copy of which is attached as Exhibit 2 to the notice to creditors regarding this Motion; and

3. Minutes of a Special Meeting of the Board of Directors and Shareholders of Husch & Husch, Inc., a Washington Corporation, a copy of which is attached as Exhibit 3 to the notice to creditors regarding this Motion.

This Motion is based upon the records and files herein and upon the Declaration of Allen Husch, Debtor's representative.

DATED this 18th day of November, 2020.

SOUTHWELL & O'ROURKE, P.S.

BY:/s/ Dan O'Rourke
DAN O'ROURKE, WSBA #4911
Attorney for Debtor

Motion-2

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